

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA, §
Plaintiff, §
v. § CIVIL ACTION NO. 1:20-cv-00100
§
9.980 ACRES OF LAND, MORE OR LESS, §
SITUATE IN CAMERON COUNTY, §
STATE OF TEXAS, JUAN JOSE §
MARTINEZ, *et al.*, §
Defendants. §

COMPLAINT IN CONDEMNATION

1. This is a civil action brought by the United States of America at the request of the Secretary of the Department of Homeland Security, through the Acquisition Program Manager, Wall Program Management Office, U.S. Border Patrol Program Management Office Directorate, U.S. Border Patrol, U.S. Customs and Border Protection, Department of Homeland Security, for the taking of property under the power of eminent domain through a Declaration of Taking, and for the determination and award of just compensation to the owners and parties in interest.

2. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1338.

3. The interest in property taken herein is under and in accordance with the authority set forth in Schedule "A."

4. The public purpose for which said interest in property is taken is set forth in Schedule "B."

5. The legal description and map or plat of land in which certain interests are being acquired by the filing of this Complaint, pursuant to the Declaration of Taking, are set forth in Schedules "C" and "D."

6. The interest being acquired in the property described in Schedules "C" and "D" is set forth in Schedule "E."

7. The amount of just compensation estimated for the property interest being acquired is set forth in Schedule "F."

8. The names and addresses of known parties having or claiming an interest in said acquired property are set forth in Schedule "G."

9. Local and state taxing authorities may have or claim an interest in the property by reason of taxes and assessments due and eligible.

WHEREFORE, Plaintiff requests judgment that the interest described in Schedule "E" of the property described in Schedules "C" and "D" be condemned, and that just compensation for the taking of said interest be ascertained and awarded, and for such other relief as may be lawful and proper.

Respectfully submitted,

RYAN K. PATRICK
United States Attorney
Southern District of Texas

By: s/Baltazar Salazar
Baltazar Salazar
Assistant United States Attorney
Attorney-in-Charge for Plaintiff
S.D. Tex. ID No. 3135288
Texas Bar No. 24106385
600 E. Harrison Street, Suite 201
Brownsville, Texas 78520
Tel: (956) 983-6057
Fax: (956) 548-2775
E-mail: Baltazar.Salazar@usdoj.gov

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (*SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.*)

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)

- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service

- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

SCHEDULE A

SCHEDULE A

AUTHORITY FOR THE TAKING

The property is taken under and in accordance with 40 U.S.C. §§ 3113 and 3114, which authorize the condemnation of land and the filing of a Declaration of Taking; the Act of Congress approved September 30, 1996, as Public Law 104-208, Division C, Section 102, 110 Stat. 3009-546, 3009-554-55, as amended and codified at 8 U.S.C. § 1103(b) & note; and the Act of Congress approved February 15, 2019, as Public Law 116-6, div. A, tit. II, Section 230, which appropriated the funds that shall be used for the taking.

SCHEDULE B

SCHEDULE B

PUBLIC PURPOSE

The public purpose for which said property is taken is to construct, install, operate, and maintain roads, fencing, vehicle barriers, security lighting, cameras, sensors, and related structures designed to help secure the United States/Mexico border within the State of Texas.

SCHEDULE C

SCHEDULE C

LEGAL DESCRIPTION

Cameron County, Texas

Tract: RGV-HRL-7512

Owners: Juan Jose Martinez, *et al.*

Acres: 9.980

Being a 9.980 acre tract (434,741 sq ft) parcel of land, more or less, being out of a called 53.1 acre tract, calculated as 46.870 acres remaining on the River side of Military Highway, in Cameron County, Texas conveyed to Juan Balli Martinez, Volume 1258, Page 260. Said parcel of land more particularly described by metes and bounds as follows;

Starting at COE Project control marker CR-06-2019, COE PID#: AHJ384, having the following NAD83 (2011) Grid Coordinates N=16521431.90, E=1280570.34; Thence S 67°47'12" W a distance of 6387.94 feet to a found ½" iron rod on the South line of the Juan Balli Martinez, Volume 1258, Page 260, for the **Point of Commencement**, having the following coordinates: N=16519016.90, E=1274656.50.

Thence: N 13°31'44" E departing said property line, a distance of 421.61 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7510-8=7512-1, for the **Point of Beginning**, said point being on the West line of the Juan Balli Martinez tract, Volume 1258, Page 260 and on the East line of the Paul L. Sladek, Volume 65102, Page 35 and on the West line of the I.B.W.C. levee Right-of-Way File No. 10001-RV-651-C, having the following coordinates: N=16519426.82, E=1274755.13.

Thence: N 20°17'09" E along said property line, along said I.B.W.C. line, crossing the center of an existing 22 foot wide dirt road at 103 feet, a distance of 150.58 feet to a found ½" iron rod with a blue cap designated as RGV-HRL-7510-7=7512-2 for angle, said point being on the South line of the Access Easement for Tower;

Thence: N 19°53'09" E along said property line, along said I.B.W.C. line, departing said Easement line, crossing the center of the levee road at 38 feet, departing the Access Easement for Tower at 60.12 feet, a distance of 112.07 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7510-6=7512-3 for angle;

Thence: S 67°59'26" E departing said property line, departing said I.B.W.C. line, following a line at an approximate 60 foot offset North of the existing levee toe, a

SCHEDULE C (Cont.)

distance of 136.52 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-4 for angle;

Thence: S 76°08'52" E along said North line, crossing the center of an existing 17 foot wide dirt road at 45 feet, a distance of 203.07 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-5 for angle;

Thence: N 83°38'41" E along said North line, a distance of 42.41 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-6 for angle;

Thence: N 47°23'48" E along said North line, a distance of 341.15 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-7 for angle;

Thence: N 45°00'32" E along said North line, a distance of 160.89 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-8 for angle;

Thence: N 47°08'16" E along said North line, a distance of 155.17 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-9 for angle;

Thence: N 54°31'30" E along said North line, a distance of 59.05 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-10 for angle;

Thence: N 59°59'22" E along said North line, a distance of 264.97 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-11 for angle;

Thence: N 59°24'30" E along said North line, a distance of 306.36 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-12 for angle;

Thence: N 61°51'12" E along said North line, a distance of 203.58 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-13 for angle;

Thence: N 65°29'08" E along said North line, a distance of 149.24 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-14 for angle;

Thence: N 69°22'20" E along said North line, a distance of 71.05 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-15 for angle;

Thence: S 68°07'28" E along said North line, entering the Access Easement for Tower at 61.65 feet, departing the I.B.W.C. levee Right-of-Way File No. 10001-RV-651-C at 66.16 feet, crossing the center of an existing 17 foot wide dirt road at 88 feet, a distance

SCHEDULE C (Cont.)

of 130.14 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-16=7513-1 for angle, said point being on the South line of the Juan Balli Martinez tract, Volume 1258, Page 260 and on the North line of the San Pedro Pit LLC tract, Volume 15434, Page 76 and on the South line of the Access Easement for Tower;

Thence: S 50°44'39" W departing said North line, along said property line, along said Easement line, to the center of an existing 7 foot wide dirt road, a distance of 43.10 feet to a found ½" iron rod with a blue cap designated as RGV-HRL-7507-1-5=7512-17=7513-7 for angle, said point being on the South line of the Juan Balli Martinez tract, Volume 1258, Page 260 and on the North line of the Leal Farms, INC tract, Volume 9299, Page 186 and the Southeast corner of the I.B.W.C. levee Right-of-Way File No. 10001-RV-651-C;

Thence: S 46°56'02" W departing said dirt road, departing said Easement line, along said property line, along said I.B.W.C. line, crossing the center of the levee road at 60 feet, a distance of 104.61 feet to a found 2-1/2" aluminum cap designated as RGV-HRL-7507-1-4=7512-18 for angle;

Thence: S 60°08'08" W along said property line, along said I.B.W.C. line, a distance of 47.10 feet to a found ½" iron rod with a yellow cap designated as RGV-HRL-7507-1-3=7512-19 for angle;

Thence: S 61°23'51" W along said property line, along said I.B.W.C. line, a distance of 449.03 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7507-1-2A=7512-19A for a Point on Line;

Thence: S 61°23'51" W along said property line, along said I.B.W.C. line, a distance of 449.03 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7507-1-2=7512-20 for angle;

Thence: S 38°21'31" W along said property line, along said I.B.W.C. line, a distance of 430.02 feet to a found ½" iron rod with a yellow cap designated as RGV-HRL-7507-1-1=7512-21 for angle;

Thence: S 20°08'13" W along said property line, along said I.B.W.C. line, a distance of 140.22 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7507-1-29=7512-22 for angle, said point being on the South limit of the 150' enforcement zone;

SCHEDULE C (Cont.)

Thence: S 44°44'16" W departing said property line, departing said I.B.W.C. line, along said enforcement zone, departing the I.B.W.C. levee Right-of-Way File No. 10001-RV-651-C at 14.85 feet, crossing the center of an existing 20 foot wide dirt road at 105 feet, a distance of 126.14 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-23 for angle;

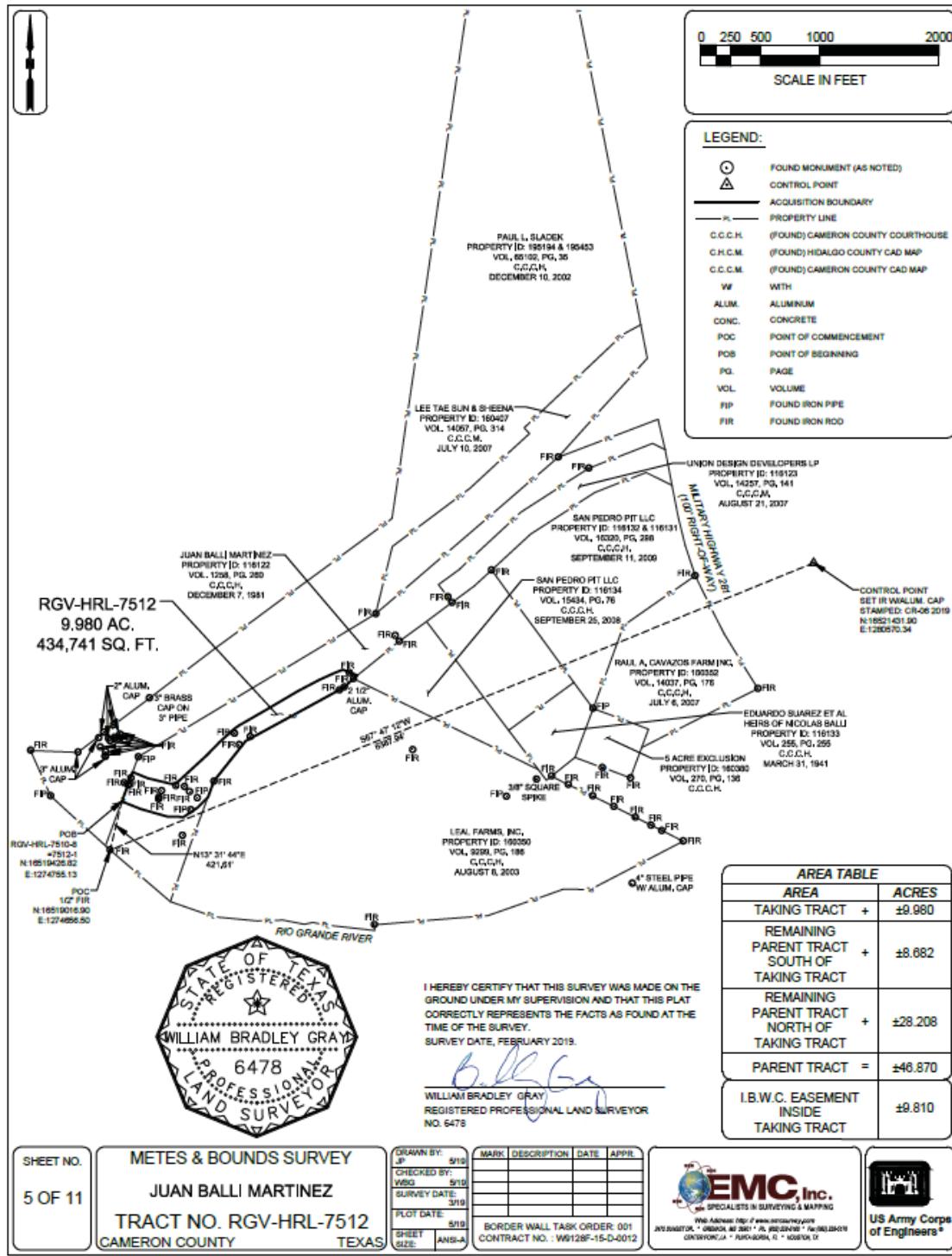
Thence: S 56°12'24" W along said enforcement zone, entering the I.B.W.C. levee Right-of-Way File No. 10001-RV-651-C at 79.83 feet, crossing the center of an existing 20 foot wide dirt road at 104 feet, a distance of 140.34 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-24 for angle;

Thence: N 88°43'00" W along said enforcement zone, crossing the center of an existing 20 foot wide dirt road at 15 feet, a distance of 137.69 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-25 for angle;

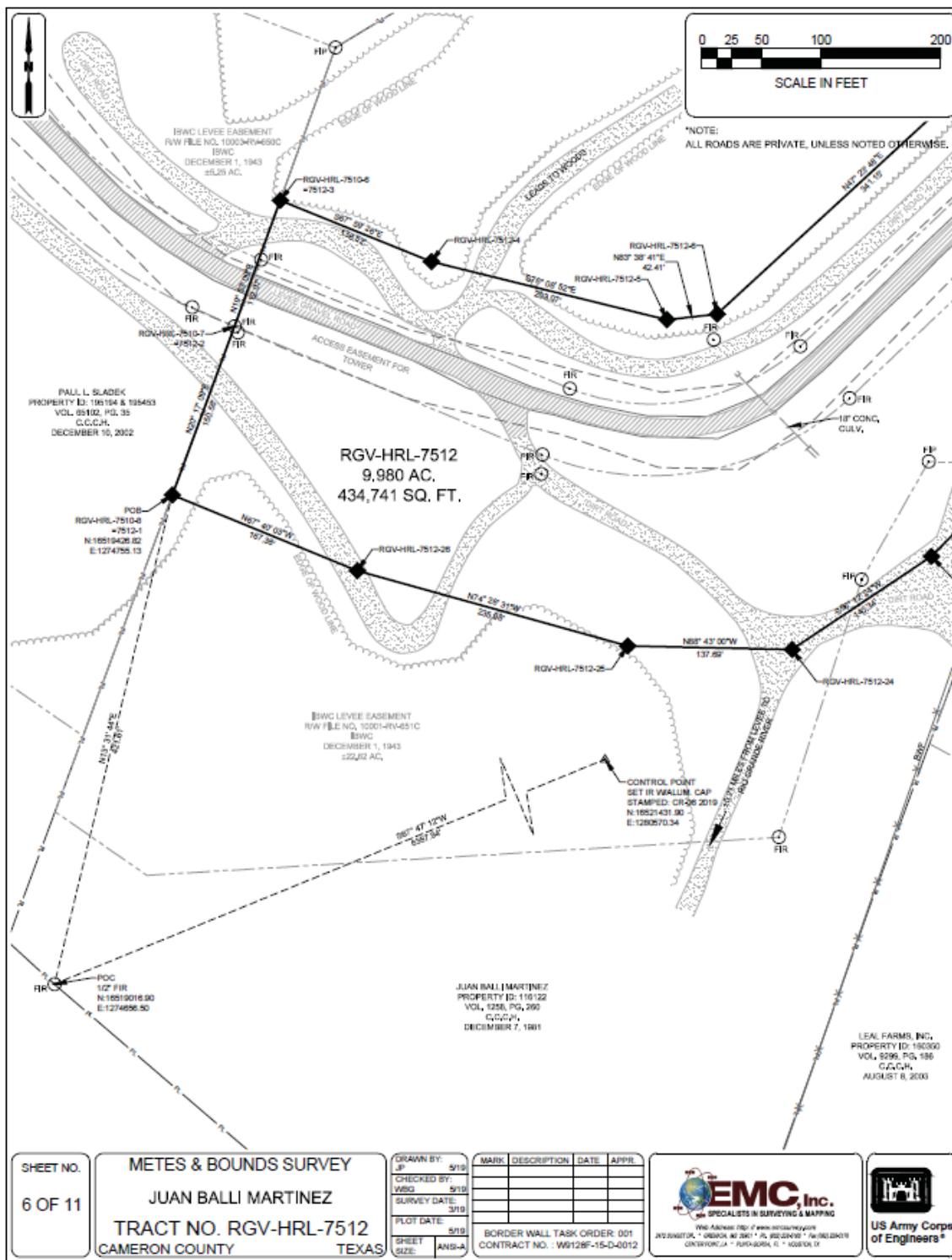
Thence: N 74°28'31" W along said enforcement zone, crossing the center of an existing 12 foot wide dirt road at 161 feet, a distance of 235.08 feet to a set 5/8" x 36" iron rebar and EMC Inc. 3" aluminum cap stamped RGV-HRL-7512-26 for angle;

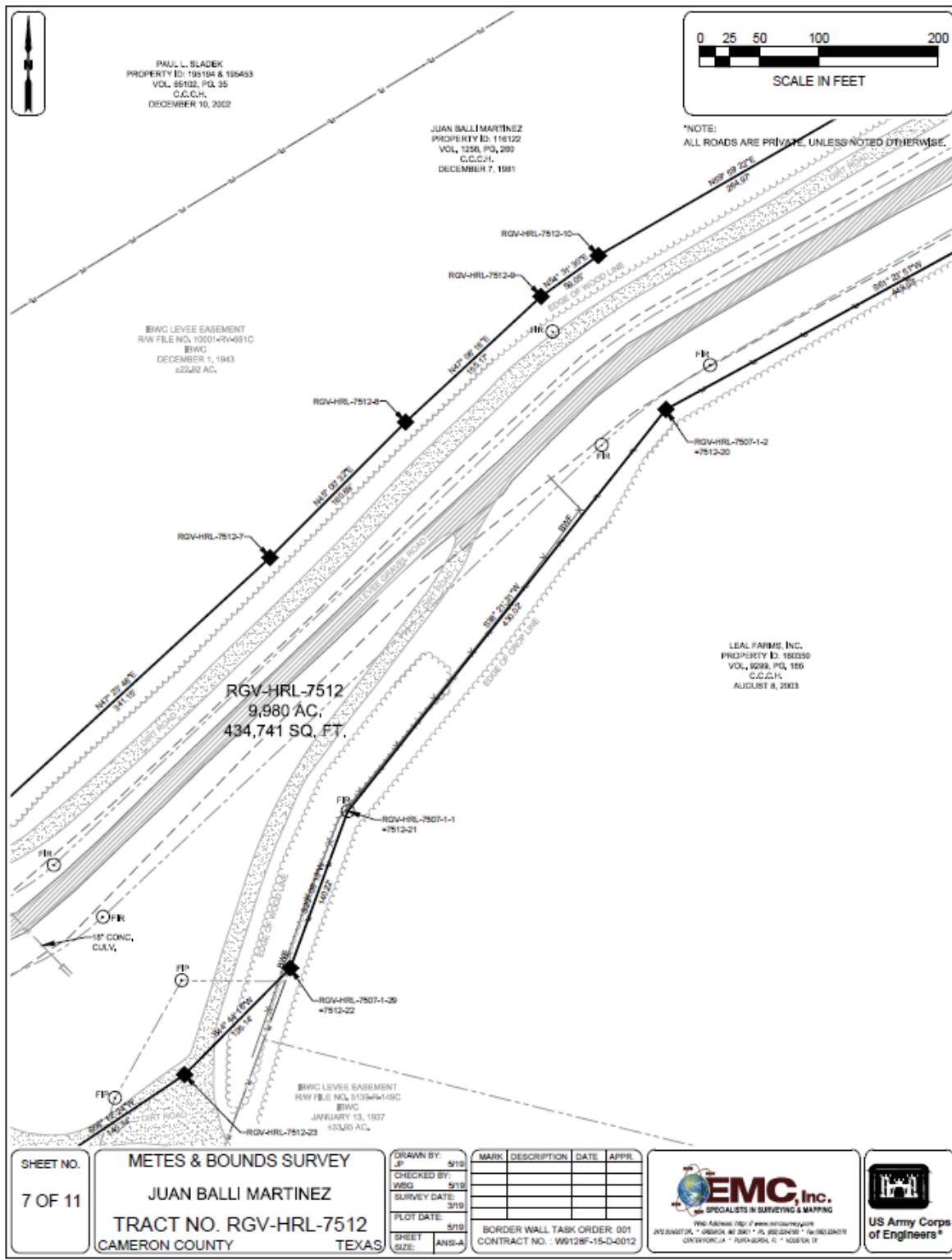
Thence: N 67°40'03" W along said enforcement zone, crossing the center of an existing 22 foot wide dirt road at 7 feet, a distance of 167.38 feet, returning to the **Place of Beginning.**

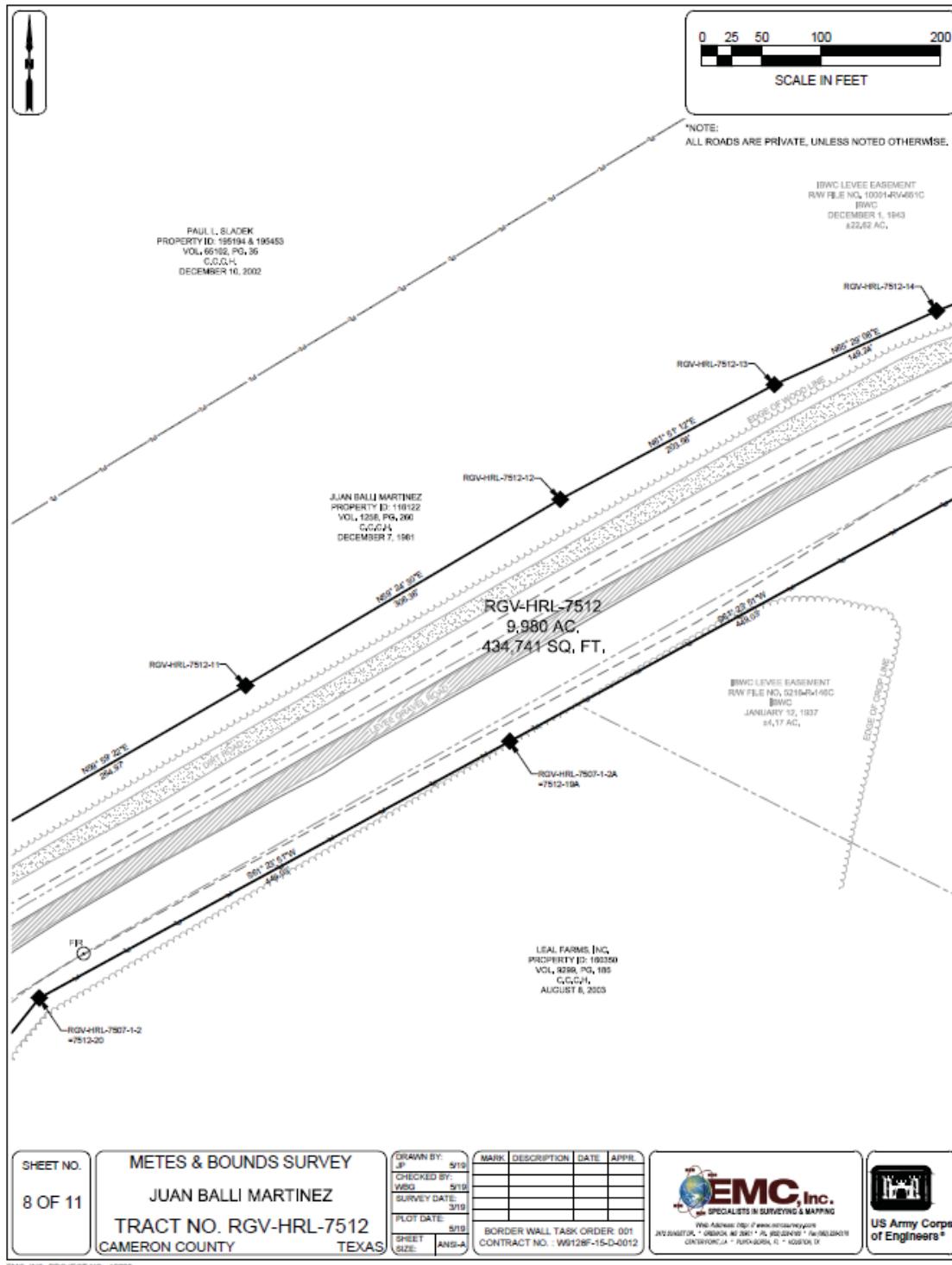
SCHEDULE D

SCHEDULE D**MAP or PLAT**

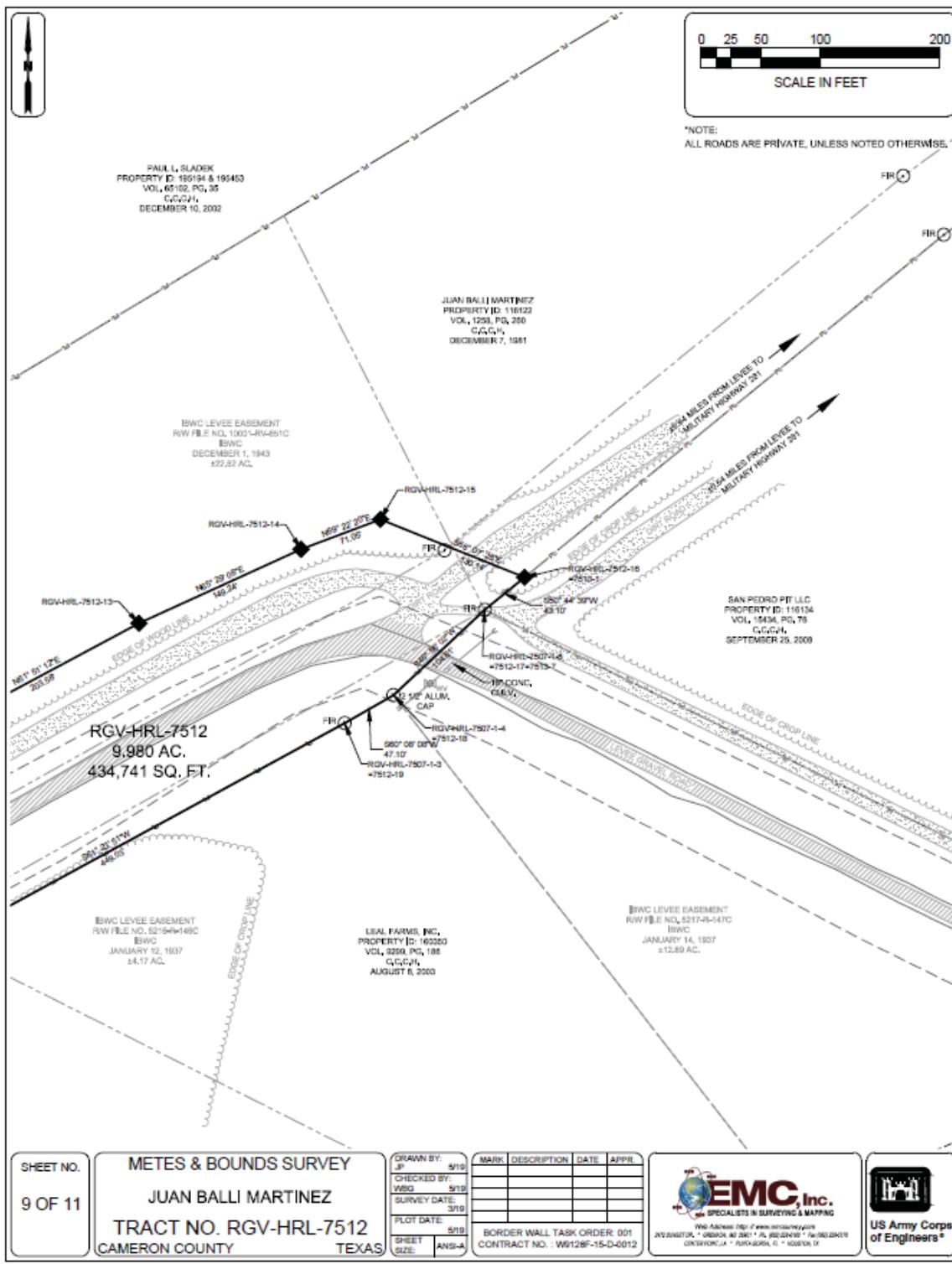
SCHEDULE D (Cont.)



SCHEDULE D (Cont.)

SCHEDULE D (Cont.)

SCHEDULE D (Cont.)



SCHEDULE D (Cont.)**LEGEND:**

○	FOUND MONUMENT (AS NOTED)	— USO —	UNDERGROUND COMMUNICATIONS/TELEPHONE LINE	EDGE OF RIPRAP
◆	SET 58° IR WALL/ALUM CAP STAMPED (AS NOTED)	— FO —	UNDERGROUND FIBER OPTIC LINE	EDGE OF VEGETATING (TYPE NOTED)
▲	CONTROL POINT	— CB —	CATCH BASIN	X	MISCELLANEOUS SYMBOL (SEE LABEL)
—	ACQUISITION BOUNDARY	— S ₁ —	STORM GRATE	C.C.C.H.	(FOUND) CAMERON COUNTY COURTHOUSE
—	EASEMENT LINE	— S ₂ —	STORM SEWER VALVE	C.H.C.M.	(FOUND) HIDALGO COUNTY CAD MAP
— PL —	PROPERTY LINE	— S ₃ —	STORM MANHOLE	C.C.C.M.	(FOUND) CAMERON COUNTY CAD MAP
—	EXISTING WALL	— S ₄ —	STORM SEWER	W	WITH
—	LEVEE CENTERLINE	— C ₁ —	CULVERT	UNK.	UNKNOWN
—	LEVEE TOP BANK	— C ₂ —	HEADWALL AND WINGWALL	ALUM.	ALUMINUM
—	LEVEE TOE	— C ₃ —	TOP OF DITCH	CONC.	CONCRETE
—	EDGE OF ROAD (TYPE NOTED)	— C ₄ —	BOTTOM OF DITCH	CULV.	CULVERT
—	SAVE AND EXCEPT AREA	— E —	EDGE OF WATER	POC	POINT OF COMMENCEMENT
—	EDGE OF SIDEWALK	— W ₁ —	WATER PUMP	POS	POINT OF BEGINNING
—	BUILDING OUTLINE (SEE LABEL)	— W ₂ —	MONITORING WELL	PGL	PAGE
—	FENCE (TYPE NOTED)	— W ₃ —	WATER VALVE	VOL	VOLUME
—	EDGE OF STRUCTURE (SEE LABEL)	— W ₄ —	WATER METER	FIP	FOUND IRON PIPE
—	BRIDGE OUTLINE	— W ₅ —	HYDRANT	FIR	FOUND IRON ROD
—	OVERHEAD ELECTRICAL LINE	— W ₆ —	WATER EXTINGUISHER/FAUCET/SPICKET	1STFRR	1 STORY FRAME HOUSE
—	UNDERGROUND ELECTRICAL LINE	— W ₇ —	WATER MANHOLE	2STFRR	2 STORY FRAME HOUSE
—	LIGHT POLE	— W ₈ —	WATER LINE	1STBR	1 STORY BRICK HOUSE
—	UTILITY POLE	— W ₉ —	LIFT STATION	2STBR	2 STORY BRICK HOUSE
—	GUY END	— W ₁₀ —	PUMP STATION	1STCB	1 STORY COMMERCIAL BUILDING
—	GUY POLE	— W ₁₁ —	SEWER CLEAN CUT	2STCB	2 STORY COMMERCIAL BUILDING
—	JUNCTION BOX	— W ₁₂ —	SEWER MANHOLE	1STSB	1 STORY STORE BUILDING
—	ELECTRICAL MANHOLE	— W ₁₃ —	SEWER WATER PUMP	2STSB	2 STORY STORE BUILDING
—	ELECTRICAL METER	— W ₁₄ —	SANITARY SEWER VAULT	SHDWFM	SHED WOOD FRAME
—	ELECTRICAL PULL BOX	— W ₁₅ —	SANITARY SEWER LINE	SHDBR	SHED BRICK
—	TRANSMISSION TOWER	— W ₁₆ —	GAS TANK	CLF	CHAIN LINK FENCE
—	SUBSTATION	— W ₁₇ —	GAS VALVE	WF	WOODEN FENCE
—	ELECTRICAL TRANSFORMER	— W ₁₈ —	GAS METER	SBF	STONE OR BRICK FENCE
—	COMMUNICATION/TELEPHONE MANHOLE	— W ₁₉ —	GAS LINE MARKER	BWF	BARBED WIRE FENCE
—	COMMUNICATION/TELEPHONE JUNCTION BOX/PEDESTAL	— W ₂₀ —	GAS VAULT	GAT	GATE
—	OVERHEAD COMMUNICATIONS/TELEPHONE LINE	— W ₂₁ —	GAS LINE	CEM	CEMETERY OUTBOUND
—		— D —	DOCKS / DECKS/ PIERS	HOSTN	HEAD STONE

GENERAL SURVEYOR'S NOTES:

1. THE BEARINGS, DISTANCES AND COORDINATE VALUES SHOWN HEREON ARE BASED ON THE TEXAS STATE PLANE COORDINATE SYSTEM, REFERENCED TO NAD 83(2011), TX SOUTH ZONE(4205), US SURVEY FEET, USING THE CORS(2011) ADJUSTMENT. THE DISTANCES AND COORDINATES SHOWN HEREON ARE GRID VALUES AND MAY BE CONVERTED TO GROUND (SURFACE) USING A SCALE FACTOR OF 1.000040021 (E.G. GRID X 1.000040021 = SURFACE).
2. A SEPARATE METES & BOUNDS DESCRIPTION OF EQUAL DATE WAS WRITTEN IN CONJUNCTION WITH THIS SURVEY PLAT.
3. THIS SURVEY WAS PERFORMED WITHOUT THE BENEFIT OF A TITLE COMMITMENT. THE SUBJECT PARCEL MAY BE SUBJECT TO RECORDED, UNRECORDED OR MIS-INDEXED INSTRUMENTS OR FACTS WHICH WOULD BE REVEALED BY A THOROUGH TITLE EXAMINATION.
4. THE REMAINING ACREAGE OF THE PARENT TRACT WAS CALCULATED FROM THE RECORDED INSTRUMENTS AND/OR GIS INFORMATION PROVIDED BY THE COUNTY AND IS NOT BASED ON FIELD DIMENSIONS.
5. EMC, INC. HAS PROVIDED THESE SURVEY SERVICES TO THE CORPS OF ENGINEERS AS THE PRIME CONSULTANT. THE CORPS CONTRACTING OFFICER'S REPRESENTATIVE IS STEPHEN CORLEY, RPLS (B17) 886-11453.
6. TEXAS 811 UTILITY LOCATE REQUEST WAS SUBMITTED FOR THIS SURVEY ON FEBRUARY 25, 2019 (TICKET NO. 1955633105).
7. LONE STAR 811 UTILITY LOCATE REQUEST WAS SUBMITTED FOR THIS SURVEY ON FEBRUARY 25, 2019 (TICKET NO. 590544860).

SHEET NO. 10 OF 11	METES & BOUNDS SURVEY JUAN BALLI MARTINEZ TRACT NO. RGV-HRL-7512 CAMERON COUNTY TEXAS		DRAWN BY: JP CHECKED BY: WSG SURVEY DATE: PLOT DATE: SHEET SIZE: ANSI-A	MARK DESCRIPTION DATE APPR.	BORDER WALL TASK ORDER: 001 CONTRACT NO.: W912BF-15-D-0012	 WE SPECIALIZE IN SURVEYING & MAPPING 1920 BARKER CREEK DR • SUITE 100 • HOUSTON, TX 77057 • 281.288.2470 • FAX: 281.288.2471 CONSTRUCTION • PLANNING • SURVEYING • CAD • GIS • DRONE	
-----------------------	--	--	--	--------------------------------------	---	---	---

EMC, INC. PROJECT NO.: 19008

SCHEDULE D (Cont.)

MONUMENT TABLE		
MONUMENT NAME	NORTHING	EASTING
RGV-HRL-7510-8=7512-1	16519426.82	1274755.13
RGV-HRL-7510-7=7512-2	16519568.06	1274807.33
RGV-HRL-7510-6=7512-3	16519673.45	1274845.46
RGV-HRL-7512-4	16519622.29	1274972.03
RGV-HRL-7512-5	16519573.67	1275169.19
RGV-HRL-7512-6	16519578.37	1275211.34
RGV-HRL-7512-7	16519809.30	1275462.45
RGV-HRL-7512-8	16519923.05	1275576.23
RGV-HRL-7512-9	16520028.60	1275689.97
RGV-HRL-7512-10	16520082.87	1275738.06
RGV-HRL-7512-11	16520195.39	1275967.50
RGV-HRL-7512-12	16520351.30	1276231.22
RGV-HRL-7512-13	16520447.34	1276410.72
RGV-HRL-7512-14	16520509.26	1276546.51
RGV-HRL-7512-15	16520534.29	1276613.00
RGV-HRL-7512-16=7513-1	16520485.80	1276733.77
RGV-HRL-7507-1-5=7512-17=7513-7	16520458.53	1276700.39
RGV-HRL-7507-1-4=7512-18	16520387.10	1276623.97
RGV-HRL-7507-1-3=7512-19	16520363.64	1276583.13
RGV-HRL-7507-1-2A=7512-19A	16520148.68	1276188.90
RGV-HRL-7507-1-2=7512-20	16519933.71	1275794.66
RGV-HRL-7507-1-1=7512-21	16519566.52	1275527.80
RGV-HRL-7507-1-29=7512-22	16519464.87	1275479.53
RGV-HRL-7512-23	16519375.27	1275390.75
RGV-HRL-7512-24	16519297.21	1275274.12
RGV-HRL-7512-25	16519300.30	1275136.46
RGV-HRL-7512-26	16519363.22	1274909.95

SHEET NO. 11 OF 11	METES & BOUNDS SURVEY JUAN BALLI MARTINEZ		DRAWN BY: 519	MARK	DESCRIPTION	DATE	APPR.
	TRACT NO. RGV-HRL-7512 CAMERON COUNTY TEXAS		CHEKED BY: 519				
			SURVEY DATE: 3/19				
			PLOT DATE: 5/19				
			SHEET SIZE: ANSA	BORDER WALL TASK ORDER: 001 CONTRACT NO.: W9128F-15-D-0012			
EMC, INC. PROJECT NO.: 19008							



1900 Avenue 1900 • Suite 100 • Washington, DC 20006 • Ph: (202) 224-7900 • Fax: (202) 224-0116

**LAND TO BE CONDEMNED**

Tract: RGV-HRL-7512

Owners: Juan Jose Martinez, *et al.*

Acreage: 9.980

SCHEDULE E

SCHEDULE E

ESTATE TAKEN

Cameron County, Texas

Tract: RGV-HRL-7512

Owners: Juan Jose Martinez, *et al.*

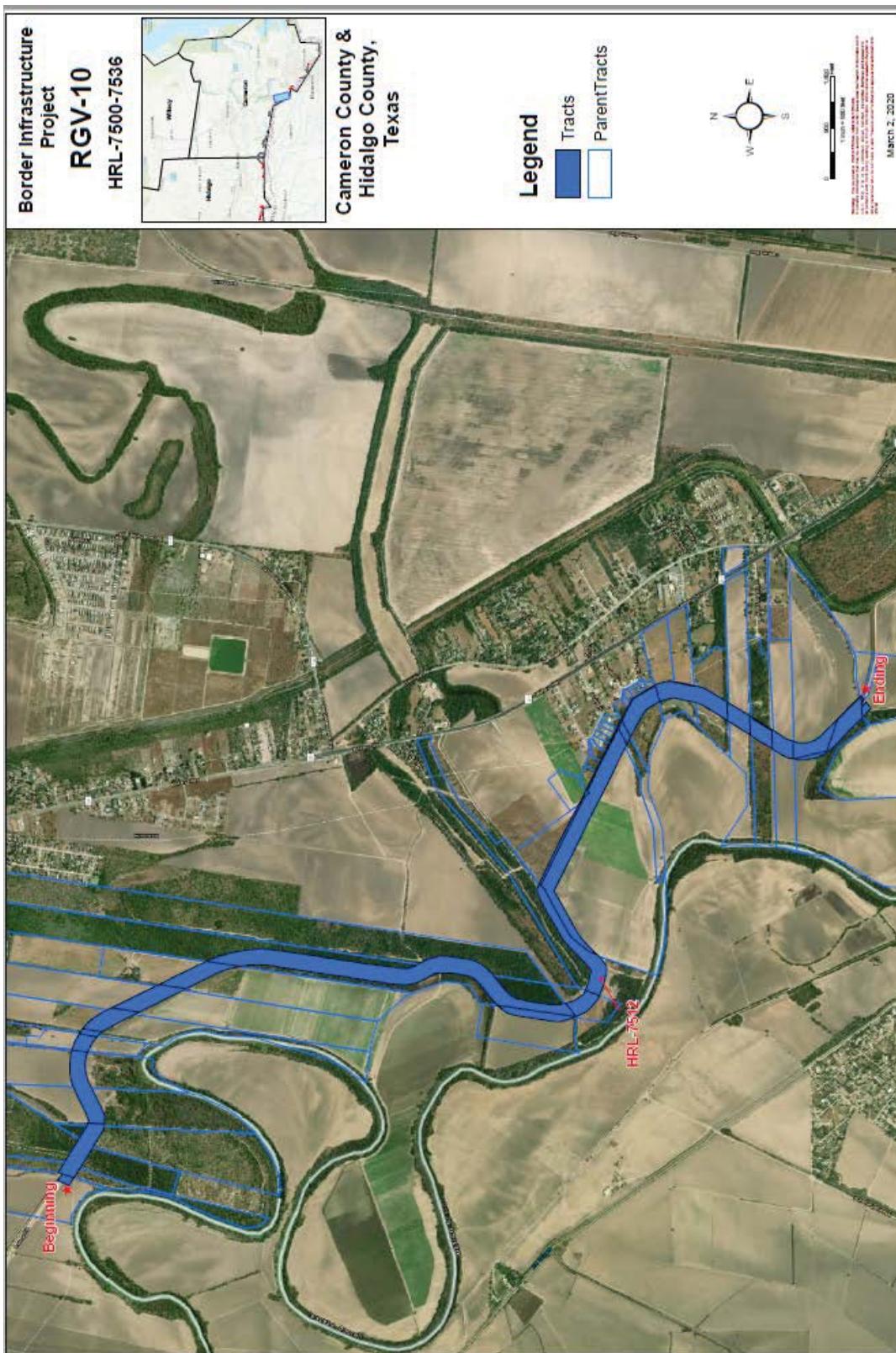
Acres: 9.980

The estate taken is fee simple, subject to existing easements for public roads and highways, public utilities, railroads, and pipelines; and subject to all interests in minerals and appurtenant rights for exploration, development, production and removal of said minerals;

Reserving to the owners of land described in Quit-Claim Deed recorded with Deed Records, Cameron County, Texas, on 4 December 1981, volume 1258, page 260, document number 34788, reasonable access to and from the owners' lands lying between the Rio Grande River and the border barrier through opening(s) or gate(s) in the border barrier between the westernmost mark labeled "Beginning" and easternmost mark labeled "Ending" depicted on the map below;

Excepting and excluding all interests in water rights and water distribution and drainage systems, if any, provided that any surface rights arising from such water rights or systems are subordinated to the United States' construction, operation, and maintenance of the border barrier.

SCHEDULE E (Cont.)



SCHEDULE

F

SCHEDULE F

ESTIMATE OF JUST COMPENSATION

The sum estimated as just compensation for the land being taken is TWENTY EIGHT THOUSAND, NINE HUNDRED SIXTY-THREE DOLLARS AND NO/100 (\$28,963.00), to be deposited herewith in the Registry of the Court for the use and benefit of the persons entitled thereto.

SCHEDULE

G

SCHEDULE G**INTERESTED PARTIES**

The following table identifies all persons who have or claim an interest in the property condemned and whose names are now known, indicating the nature of each person's property interest(s) as indicated by references in the public records and any other information available to the United States. *See Fed. R. Civ. P. 71.1(c).*

Interested Party	Reference
Juan Jose Martinez [REDACTED] Rancho Viejo, TX [REDACTED] <i>Heir of Juan Balli Martinez</i>	<u>RGV-HRL-7512</u> Judgment, Document #1976-21697, Vol. 1064, Pg. 316, Recorded in Deed Records of Cameron County, Texas; Quit Claim Deed, Document #1981-34788, Vol. 1258, Pg. 260, Recorded December 4, 1981 in Deed Records of Cameron County, Texas; Probate Administration, Document # 1987-CPC-25,121-B, Vol. 32, Pg. 190 Recorded May 8, 1987 in Records of County Court at Law No. 2 of Cameron County, Texas.
Gloria Cuellar [REDACTED] Riviera, Texas [REDACTED] <i>Heir of Juan Balli Martinez</i>	
Petra Casares [REDACTED] Pasadena, TX [REDACTED] <i>Heir of Juan Balli Martinez</i>	
Cindy M. Lopez [REDACTED] Brownsville TX [REDACTED] <i>Heir of Orencio Martinerz/ Juan Balli Martinez</i>	
Orencio Martinez, Jr. [REDACTED] Brownsville TX [REDACTED] <i>Heir of Orencio Martinez/ Juan Balli Martinez</i>	
Sulema Valencia [REDACTED] San Antonio, Texas [REDACTED] <i>Heir of Juan Balli Martinez</i>	
Olivia Rodriguez [REDACTED]	

Brownsville Texas [REDACTED] <i>Heir of Juan Balli Martinez</i>	
Antonio "Tony" Yzaguirre, Jr. Cameron County Tax Assessor-Collector [REDACTED] Brownsville, Texas [REDACTED]	<u>RGV-HRL-7512</u> Account No. 71-0070-0070-0000-00 Appraisal Property No. 116122